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The Honorable Jacqueline Scott Corley
USDC, Northern District of California
San Francisco Courthouse
Courtroom F - 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Waymo LLC v. Uber Technologies, Inc. et al.*, Case No. 3:17-cv-00939

Dear Magistrate Judge Corley:

Per the Court's request, this letter briefly addresses Waymo's contention that they have met the apex standard for deposing Uber's Chief Legal Officer because of a purported conflict regarding what was said about the Stroz investigation at an Uber Board meeting. First, as of now, there is no conflict. Waymo is simply anticipating that there might be a conflict after Travis Kalanick is deposed on Monday. Second, Waymo is already scheduled to depose two other people (Cam Poetzsch and Nina Qi on Friday and Saturday, respectively) who attended that Board meeting. Thus, this issue is premature and even if there were a dispute between Mr. Kalanick and a Board member about what was said, there are two other deponents who can be questioned on this issue.

Respectfully submitted,



Arturo J. González